



Laura R. Walker
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June 16, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

I am writing in regards to the matter of *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service*.

As President of WNYC Radio, I know that our over 1.1 million listeners turn to WNYC each week because of the excellent programming we produce and broadcast, and because of the quality of our audio. HD Radio's improved sound quality and elimination of distorting interference are important factors that will motivate us to transition to digital broadcasting. However, the decisive factor for WNYC Radio is the capability to serve supplemental audio programming (or "multiplexing" to use the Commission's term.) I believe the use of supplemental audio is integral to our public service mission and enables us to expand programming to meet listener needs that are either underserved or not at all.

New York Public Radio -- the nation's most listened to public radio station -- strives to provide quality, in-depth programming to listeners in our area. Multiplexing of the digital audio signal enables us to provide programs to specific audiences that currently are not served. In its simplest form, this could mean providing our main programming on the primary channel, and an additional service such as music programming on the supplemental channel. In some instances, language-specific programs serving populations of non-English speaking citizens might also be provided.

The supplemental audio channel provides our public radio station with a cost-effective means to expand the quality and quantity of local, diverse programming; thereby improving our overall offerings to the community we serve.

WNYC Radio participated in extensive testing specifically of this supplemental channel during the fall and winter of 2003 and 2004 as part of the National Public Radio Tomorrow Radio field testing project. The testing proved this signal to be a tremendous success, reaching a population of 15.74 million listeners with only 57 Watts of digital power – undoubtedly greater broadcast reach than has ever been reported with such incredibly low power.

Current analog radio technology limits WNYC to providing only one programming service per channel to our community. Digital broadcasting, with multicasting capabilities, will enable WNYC to use existing programs in expanded fashion and to develop new, more varied and diverse programming formats whose appeal may be more targeted and defined.

Another exciting aspect of the supplemental audio channel capability is its tremendous cost effectiveness. It presents enormous efficiencies compared to the difficulty and cost associated with acquiring additional frequencies. The resource savings gained through digital audio multiplexing can be directed into programming that expands services.

Beyond authorizing the use of HD Radio technology to offer supplemental audio channels, the FCC's goals will be well served by providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission. Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology for remunerative purposes will strengthen our ability to continue to serve the public better into the future.

Thank you for your consideration.

Sincerely,

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Cc:

Senator Charles E. Schumer; Senator Hillary Rodham Clinton;
Rep. Eliot L. Engel; Rep. Vito Fossella; Rep. Nita M. Lowey;
Rep. Jerrold Nadler; Rep. José E. Serrano; Rep. John E. Sweeney;
Rep. Edolphus Towns; Rep. Nydia M. Velázquez